



Audubon CALIFORNIA

February 22, 2011

Mr. Carlton Morris, FWS Project Manager

U.S. Fish and Wildlife Service, Division of Engineering

911 NE 11th Avenue

Portland, Oregon 97232

Re: Engineering Evaluation/Cost Analysis (EE/CA) for Removal of Lead-based Paint from Structures and Lead-contaminated Soil from Midway Atoll National Wildlife Refuge

Dear Mr. Morris:

We apologize for the tardy submission and respectfully request that you accept this brief comment past the deadline.

Audubon California congratulates Midway Atoll National Wildlife Refuge on its progress in removing lead-based paint from buildings, which are limiting the recovery of Black-footed albatrosses and possibly other wildlife, and creating an unacceptable human health hazard.

We concur that 75 mg/kg for lead in soil would provide a safe environment for the humans and wildlife on the island. Furthermore, we urge the Service to actually remove the soils around these buildings and not use geomembranes or encapsulation painting, which are temporary fixes and will not address the problem over the long term.

Finally, we strongly encourage USFWS to completely remove the crumbling structures on Midway, which pose risks to the safety of humans and wildlife. We suggest first removing the cable company buildings, as their condition is most unstable.

In sum, Audubon California looks forward to continuing to track FWS progress on remediating lead toxicity and other outstanding issues related to old buildings on the Refuge.

Respectfully,

Anna Weinstein

Seabird Program Manager